



California Regional Water Quality Control Board

Los Angeles Region



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Arnold Schwarzenegger
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TO: Jonathan S. Bishop
Executive Officer

FROM: Mohammed Zaidi/David Bacharowski

DATE: June 15, 2006

SUBJECT: Responses to Questions Received on W. W. Henry site and the Maywood Riverfront Park Project

This memorandum is meant as a follow-up to the W.W. Henry briefing memo dated June 1, 2006. On June 2, 2006, Mr. Stephen Cain met with Mr. Jerry Secundy from the SRWCB, Mr. Felipe Aguirre and Mr. Tomas Martin (both affiliated with the City of Maywood), Ms. Jane Williams and Ms. Cynthia Babich (both environmental activists) and Mr. Stacy Lear from DTSC-Cypress. At that time, there was a site tour and discussions pertaining to the W.W. Henry and the Pemaco Superfund sites in the City of Maywood. The tour and discussion resulted in the generation of a number of question from community members and the environmental activist. The questions are listed below with brief responses.

Q1. When can the park open? Is it safe for children to use?

A1. Mr. David Mango of the City of Maywood, in response to a phone call by Regional Board staff on 6/12/06, indicated that the Maywood Park would open on July 1, 2006. According to the health risk assessments performed and as confirmed by DTSC toxicologists in their letters dated February 22 and 23, 2000, the surface and near-surface soils and the VOC emissions at the ground surface of W.W. Henry site do not pose an unacceptable risk to human health and the environment to the Park users and workers. Based on DTSC's letters we consider the use of the Park to be safe for the users (including children) and site workers.

EPA Agrees.

Q2. Please provide Mr. Secundy and Aguirre with written notice that the park can be opened and is safe to use.

A2. We will forward Mr. David Mango's response to Mr. Aguirre and Mr. Secundy as soon as possible.

EPA OK with this.

Q3. Did the health risk assessment (2000/2001) look at vapor migration?

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A3. Yes. EPA concurs.

Q4. If so, what method was used to investigate vapor migration?

A4. DTSC toxicologists reviewed soil and soil gas data included in *Addendum to the Screening Human Health Risk Assessment for the W.W. Henry Property*, dated 16 February 2000, and the *Subsurface Investigation Report for the W.W. Henry Property* dated August 31, 1999.

EPA took the soil vapor migration a step further. The agency conducted indoor air sampling at 4 separate events. EPA toxicologist reviewed both indoor air sampling and vapor monitoring data. EPA requested that ORD review both soil vapor samples that were collected as well as indoor air samples. Everyone agreed that no individual residence was adversely affected by the groundwater plume, and that the best solution to prevent a possible future migration scenario would be to install the soil vapor treatment system.

Q5. Much has happened/been learned about the site since 2000/2001? Is the 2000/2001 health risk assessment still valid?

A5. Yes. Since 2000, using a dual phase high vacuum extraction (DPE) system and the soil vapor extraction (SVE) system, the toluene and hexane free product had been reduced significantly from approximately 12.56 feet in January 2001 to 0.35 foot to a sheen on August 19, 2004, in the eastern portion of the site, along with very significant reduction in VOCs vapor in the western portion of the site. Therefore, based upon operation of the previous DPE system the soil gas or vapor migration portion of the risk assessment has decreased significantly.

The soil vapor risk will be further reduced with the start-up of an expanded DPE and SVE systems including 6 new SVE wells and 20 new SVE/DPE wells that were have been installed by W.W. Henry consultant Levine Fricke (LFR) and summarized in their October 15, 2005 progress report.

The City of Maywood performed their own site-wide *Health Risk Assessment, Maywood Riverfront Park, Maywood, California July 2002 (TN&N)* and developed a *Remedial Action Plan-Maywood Riverfront Park, Maywood, California February 2005 (TN&N)*, and implemented the Remedial Action Plan under their Site Safety and Health Plan, Maywood Riverfront Park Project, [Volume III, Apendix 4 of the Remedial Action Plan-Maywood Riverfront Park, Maywood California, February 2005 (TN&N)]. Construction of the Park commenced during April 2005.

EPA agrees with above comments. In addition, Gerald Hiatt reviewed the site-wide Risk Assessment for the Park and helped with the development of the risk assessment.

Q6. Is it possible to conduct another health risk assessment or have some type of confirmation sampling to prove that it is safe to use the park?

A6. Yes, Regional Board will consider requiring another soil gas sampling event of the Park portion of the W.W. Henry site at the time of the SVE/DPE systems start-up in order to assess

the current soil vapor concentrations onsite. Based on the results of this soil gas sampling event Regional Board can evaluate the need for a human health risk assessment for the site.

The EPA project manager discussed this comment with the RWQCB project manager (8/7/06) and suggested that they be careful promising to conduct any additional soil vapor monitoring on the park properties. Park development on the Henry property is complete and the park developers have placed a lot of underground irrigation piping and electrical lines in the one to two foot depth. Any CPT samples collected on the park properties could cause damage to the new park infrastructure. Unfortunately, the park contractors have not provided adequate design built diagrams for this piping.

EPA will be installing new permanent soil vapor monitoring points along 59th Place and Walker Avenue (across the street from the park in front of residences on these streets). In addition, EPA will be collecting another round of indoor air samples from the homes along Walker Avenue and 59th place prior to turning on the ERH system. EPA will share data RWQCB. RWQCB will decide how to organize a soil vapor collection system based on this data from EPA.

Q7. Is it possible to have regular soil/air tests to make sure site conditions haven't changed?

A7. Please refer to A6 above.

EPA will be collecting regular soil vapor sampling during the ERH process to ensure that vapors are not migrating towards the homes.

Q8. The community is getting different answers: Is or is not a SVE system planned for the WW Henry site?

A8. Yes, an expanded combined SVE/DPE system is scheduled to start operations as soon as the City of Maywood arranges electrical connection. This is true. City of Maywood originally agreed to take the lead on the electrical connection for the park. EPA, Henry and the City share one transformer, and EPA also has a separate transformer. The City coordination effort was not working properly. Last month EPA told SCE that the only agency who had legal authority for the EPA system was ACOE, EPA, and TN&A not the City. The delays stopped the electrical volts boxes were installed and the transformers will be delivered as soon as EPA pays the bill for the equipment.

Q9. Why isn't RB4 listening to the community's preference not to have a SVE at WW Henry?

A9. Regional Board staff have not received any comments from the community that would suggest that the SVE/DPE should not be installed and operated at the W.W. Henry site in order to complete soil and groundwater cleanup. Operation of the SVE/DPEW system at the W.W. Henry site started in January 2001 and ceased during August 2004 only to prepare the site for Park construction activities. The SVE/DPE can not be re-started until the City of Maywood arranges the electrical connections needed to operate the system. Community members have only expressed a concern for this system when they discovered that Henry's contractors were using a thermal oxidizer in 2001 and 2002. Henry removed the oxidizer when concentrations

decreased to a low enough level that carbon could be utilized instead. Henry is planning on using carbon when they turn on their system.

Q10. How come RB4 is installing a SVE and not using US/EPA's enhanced SVE, which is immediately adjacent to the WW Henry property?

A10. The SVE/DPE system at the W.W. Henry site was installed during January 2001, well in advance to the SVE system being installed at the adjacent Pemaco Superfund site. There has been a significant reduction in the contaminant mass (Toluene, Hexane, and Benzene) at the W.W. Henry site from operation of the SVE/DPE system. It is considered to be more efficient and effective to operate a separate cleanup system at the W.W. Henry site. This is true. In addition, the capacity of the EPA system could not handle vapors from Henry's system. The EPA system was designed, and equipment ordered based upon capacity needed to treat vapors from the EPA treatment area only.

Q11. How long will it take to clean the soil? How long will it take to clean with groundwater?

A11. Regional Board will evaluate the progress of the vadose zone soil cleanup and perched zone groundwater cleanup on an ongoing basis once the system is restarted. It is estimated that it could take up to two years to complete soil and groundwater cleanup and post remediation monitoring. We definitely disagree with how long it will take(longer for sure)! Henry installed a new well this year in the A and B aquifer. RWQCB can now order them to cleanup water from these zones. EPA will be cleaning up some of Henry's plume when we turn on our system. EPA and RWQCB are working together to share data from the systems and EPA may eventually issue cost recovery legal paperwork to Henry to recover costs from running the treatment system.

Q12. How will the soil and groundwater be cleaned?

A12. Please refer to A9, A10, and A11 above. OK

Q13. What is happening with the plume under people's homes? Is indoor air being monitored? Is it safe to breathe?

A13. As required by Regional Board, on March 20, 2006, LFR submitted the results of soil gas survey of 4 residential lots across 59th Place. The soil gas samples were collected at 5 and 15 feet below ground surface (bgs). Except for one 15-foot soil gas sample (toluene = 6.3 µg/L), all the 5-foot and 15-foot samples were below detection limits. Since none of the 5-foot sample had any VOCs above detection limit, there is no potential for exposure from vapors from VOC emissions from groundwater to the homes located adjacent to the sample locations, indoor air vapor samples are not planned. Agree with above. In addition, EPA and RWQCB are in discussions regarding ordering Henry to install additional groundwater treatment wells on some of the residential properties. EPA and RWQCB are meeting to discuss possible locations sometime this month. (It is tentatively scheduled for August 15th.) If Henry installs additional groundwater extraction wells on the residential properties than treatment of the groundwater plumes under the residences will occur faster.

Q14. Are RB4, DTSC and US/EPA coordinating their individual cleanup efforts/activities? The community does not want one site to be cleaned only to have the other site re-contaminate it.

A14. Yes, Regional Board staff has attended several meetings with USEPA and the interested parties. As requested by the interested parties and the City, the staff also had a meeting with the Maywood community representatives Messers Felipe Aguirre and Hector Alvarado of COMITE PRO UNO and Dr. Joseph Lyou of California Environmental Alliance (CERA) on May 25, 2005 to provide an update of the activities at the W.W. Henry site. On March 16, 2006, the staff also provided the First Quarter 2006 Progress Report to Mr. Aguirre via email, and will continue providing him with future quarterly progress reports. On January 11, 2006, the Regional Board staff attended the Public Outreach Meeting for the Pemaco Superfund site conducted by USEPA. Regional Board will take all the steps to ensure that the contamination caused by W.W. Henry site is remediated in coordination with the remedial effort made by USEPA for the Pemaco Superfund site. Agree. RWQCB has sent Henry reports to EPA since the beginning of the project. EPA reviews RWQCB documents and provides comments when appropriate. In the past, EPA and RWQCB have attended many meetings hosted by the City of Maywood Planning Office to discuss the status of the cleanup on both sites. These meetings occurred as the City and the Trust for Public land was purchasing the properties that are now incorporated into the park.

Q15. What can be done to ensure that coordination and communication between agencies/community is substantive and on going?

A15. Regional Board will continue close coordination with USEPA and the City of Maywood, the owners of the Riverfront Park property. EPA and the RWQCB talk when appropriate to ensure that coordination on the cleanups is occurring. In addition, EPA shares data with RWQCB and Henry.

Q16. When everyone meets on the 15th, there is interest in creating an advisory or other "watch dog" group.

A16. Regional Board staff has been sharing the information with the interested parties and will continue to have this open communication. EPA has agreed to meet with community members whenever they have questions on the site and whenever appropriate. The EPA project manager frequently meets with City employees and other stakeholders to discuss the status of the project or to answer any questions posed by the various entities.

Q17. The community has concerns about cross-contamination and the possibility of new dangers being created by the cross-contamination (chemical reactions resulting vapor migration, etc.). Has this been considered/addressed? Have SVEs been designed not to pull/mix contamination from each site?

A17. Most of the contamination caused by and at W.W. Henry site is because of toluene, benzene, and hexane. Whereas, chlorinated hydrocarbons are the dominant contaminants derived from the Pemaco Superfund site. Both the previous and the new SVE/DPE wells are screened in the vadose zone and in the capillary zone above the perched zone, therefore, they are designed and targeted to pull contaminants only from the W.W. Henry site and not from the Pemaco Superfund site. EPA will definitely be treating some of Henry's waste when we treat

both groundwater and soil vapor. That cannot be helped because there are some areas where the waste materials are co-mingled. The co-mingling is already occurring. However, there are no new dangers being created based upon EPA or Henry turning on the two separate treatment plants. EPA and the RWQCB can differentiate between the two soil vapor plumes because Henry's contaminants consist of toluene, benzene, and hexane. The chemical reactions that have occurred to date have actually reduced the VOC plume because the plume encountered toluene, benzene, hexane, and hydrocarbon front on the Henry properties.

